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November 1, 2005

Jeff S. Jordan, Esquire
Supervisory Attorney
Complaints Examination
& Legal Administration
Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463

Re: **MUR 5681**
High Point Regional Association of Realtors®, Inc.

Dear Mr. Jordan:

I am in receipt of your letter dated October 14, 2005 which was received on October 19, 2005, and the enclosed additional information which was provided regarding the above-referenced matter. This letter will supplement my earlier response to the complaint in a letter dated October 14, 2005 directed to you.

It appears that the Supplemental Complaint submitted by Michael D. Pugh addresses certain conduct by the High Point Regional Association of Realtors®, Inc. (HPRAR). As set forth in my previous letter, HPRAR is a local association of Realtors® affiliated with the National Association of Realtors® (NAR). The Supplemental Complaint states that it is a common practice of HPRAR to display names of non-contributing members by means of an overhead projection systems at certain monthly meetings and at the Annual Election Meeting held on September 21, 2005. I have reviewed these allegations with my client and have been informed that the information provided on the overhead projection at the monthly meeting and the September 21, 2005 Annual Election Meeting was the exact same information which was attached to the Complaint originally filed with the FEC by Michael D. Pugh in this designated case. Accordingly, I re-incorporate all of the responses that were provided in my October 14,

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Jeff S. Jordan, Supervisory Attorney
November 1, 2005
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2005 letter and the response of Ralph W. Holmen on behalf of Realtors® Political Action Committee (RPAC).

It is not a violation of the Federal Election Campaign Act (Act) for HPRAR to publish in its member newsletter the names of those members who have not contributed to RPAC or to provide the same information at a member's only meeting of HPRAR and the Annual Election Meeting of HPRAR. The information provided not only shows the non-contributing members but also the percentages of other members who have contributed to RPAC.

My client reviewed the attendance records for the meetings set forth in the Supplemental Complaint and confirmed that Mr. Pugh did not attend these meetings. As stated in our prior response, it is my understanding that certain provisions of the Act and regulations prohibit securing or soliciting contributions to RPAC by actual or threatened "force, job discrimination or financial reprisals" or other coercive methods. HPRAR would respectfully submit that based upon the facts stated in the Complaint and the Supplemental Complaint, there has not been any improper coercion applied to the individuals listed in the publication or on any overhead projection and thus HPRAR has not violated the Act in such respect.

Based upon the foregoing, and the prior responses sent by HPRAR and RPAC, I respectfully request that the Commission and the Commission staff take no action against HPRAR and/or RPAC in response to the Complaint and Supplemental Complaint, and that it be dismissed without further action. I would welcome the opportunity to discuss with you the information set forth herein, or to provide any other information or material which would assist you to conclude that a dismissal is appropriate. Please feel free to contact me at your convenience at 336.889.8733.

Yours very truly,

ROBERSON HAWORTH & REESE, P.L.L.C.


William P. Miller

Counsel to High Point Regional
Association of Realtors®, Inc.

WPM/ssw

cc: Ms. JoAnna Edwards
High Point Regional Association of Realtors®, Inc.

Ralph W. Holmen, Esquire
National Association of REALTORS

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